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Research - Conserve - Campaign

3rd December 2024

Andy Hill
Devon County Council
County Hall
Topsham Road
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Devon EX2 4QD
planning@devon.gov.uk

Dear Mr Hill,

Ref : AHX/DCC/4337/2023 - Provision of temporary construction, demolition and excavation waste recycling facility; importation and landfilling of up to 700,000 cubic metres of inert waste materials; and associated works including installation of drainage infrastructure and alterations to existing vehicular access, at Lower Brenton Farm, Brenton Road, Kennford; Peamore Park (that part to the west of the A379), Alphington, Exeter, Devon, EX2 9SJ

Thank you for consulting the Gardens Trust (GT), a Statutory Consultee with regard to proposed development affecting Peamore Park, a registered park and garden (RPG) listed at Grade II by Historic England (HE) on their Register of Parks and Gardens. The RPG consists of a mid- to late-C18 Picturesque park and Sublime pleasure ground, incorporating probable earlier features including an avenue and fishpond. The Picturesque layout is likely to have accompanied the rebuilding of the earlier house on the site in the C18. The grounds were further developed in the early C19 in similar Picturesque character, possibly with some design influence from G S Repton, who remodelled the house in the 1820s, the landscape reaching its zenith by 1842.

I have liaised with colleagues in the Devon Gardens Trust who are familiar with Peamore and have walked around the proposed landfill site. Due to private ownership, they were unable to have access to the Rock area and therefore could not ascertain whether the workings would be visible from the raised walk along the southern side of the former quarry. However, the 1904 OS suggests that such views would have existed and the walk to the south of the quarry is recorded on the 1793 plan and the Tithe, so is a key element of the historic design. The workings will also be visible from the bridleway alongside the southern boundary of the RPG, which we believe was once part of the routes around the park. There is an old gateway at the intersection of the bridleway and the western straight line coming down from the route round The Rock suggesting it connected to the route up from the east of the mansion. The landfill is in land that falls to the south. It is suggested that it would be obscured by planting, but historically and even now, it was from here that there would have been views including towards Haldon Belvedere. To introduce new planting in this area (where historically there was none), in an attempt to mitigate the acknowledged adverse impacts of the development, would itself have an adverse impact on the RPG and its setting.

Similarly, the land-fill site is very close to the site of the late C19/early C20 maze which existed in a strip of pleasure ground extending south from the south-east corner of the Rock, shown clearly in the 1904 OS map. HE's recent revision of the Register entry states that this area retains some ornamental planting even though the maze itself has gone.

The 'temporary' work to the landfill site is for a period of ten years, during which time, the impact on the setting of the RPG would be significantly adverse due to noise, dust, vehicle movements and the consequent harm to the appreciation and understanding of the designated landscape/design.

Your officers will be familiar with Historic England's *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3* (Second Edition), pub 2nd Dec 2017, Part I – Settings and Views (SHA). On page 2 of this it states : *'The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.'* These will be severely impacted by the proposals affecting Peamore. It goes on to say (p4) *'Because the contribution of setting to significance does not depend on public rights or ability to access it, significance is not dependent on numbers of people visiting it; **this would downplay such qualitative issues as the importance of quiet and tranquility as an attribute of setting**, and the importance of the setting to a local community who may be few in number.'* (our emphasis). SHA (p 11) also considers the significance of the heritage asset itself and the need to establish the contribution made by its setting. *'The experience of the asset can be compromised by many factors including',* as here, *'Views from, towards, through, across and including the asset; Busyness, bustle, movement and activity; Diurnal changes; as well as a 'Sense of enclosure, seclusion, intimacy or privacy.'*

The GT/DGT strongly object to these proposals and consider they will cause harm at the upper end of less than substantial harm, to the setting and experience of Peamore.

Yours sincerely,

Margie Hoffnung MSc, BSc Hons
Conservation Officer